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February 7, 2022

Via ECF

The Honorable Ann Marie Donio, U.S.M.J.
United States District Court for the District of New Jersey
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets
Camden, New Jersey 08101

Re: Group 2 Cases:

Kimberly Bond, et. al. v. Solvay Specialty Polymers, USA, LLC, et. al.
Civil Action No.: 1:20-cv-08487-NLH-KMW

Theresa Slusser, et. al. v. Solvay Specialty Polymers, USA, LLC, et. al.
Civil Action No.: 1:20-cv-11393-NLH-KMW

Tammy O'Leary, et. al. v. Solvay Specialty Polymers, USA, LLC, et. al.
Civil Action No.: 1:21-cv-00217-NLH-KMW

Carly Corrar, et. al. v. Solvay Specialty Polymers, USA, LLC, et. al.
Civil Action No.: 1:21-cv-00452-NLH-KMW

Shirley Bond v. Solvay Specialty Polymers, USA, LLC, et. al.
Civil Action No.: 1:21-cv-11203-NLH-KMW

Dear Judge Donio:

We represent Defendants, E. I. du Pont de Nemours and Company, The Chemours Company, and The Chemours Company FC, LLC (collectively "EID/CC"). During the January 18, 2022 status conference in the above-referenced Group 2 cases (*i.e. Kimberly Bond*, ECF Nos. 176, 179), and in Your Honor's Order dated January 20, 2022 (*i.e. Kimberly Bond*, ECF No. 177), Your Honor directed the parties to attempt to agree upon an Open Public Records Act request for submission to the Department of Environmental Protection and to update you on the status of this by January 31, 2022. You also instructed defendants to provide terms that we would include in the OPRA request to plaintiffs by January 31, 2022. On February 1, 2022, Your Honor granted the parties a one-week extension until February 7, 2022. We are writing now with an update.

Given Judge Hillman's Opinion on February 2, 2022, the parties are evaluating the appropriate language for the OPRA request, and the parties jointly request that Your Honor grant them another one-week extension of time through and including

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February 14, 2022, for defendants to provide their terms to be included in the OPRA request and to confer with plaintiffs. The parties will provide another update on February 14 with regard to their progress.

Sincerely,

/s/ Ryan Richman

Ryan Richman

cc: All counsel of record (via ECF)